

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

EMMA KOE et al.,

Plaintiffs,

v.

CAYLEE NOGGLE et al.,

Defendants.

CIVIL ACTION NO.

**PLAINTIFF TRANSPARENT'S  
CERTIFICATE OF INTERESTED PERSONS  
AND CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and Rule 3.3 of the Northern District of Georgia Local Rules, Plaintiff TransParent submits its certificate of interested persons and corporate disclosure statement:

(1) The undersigned counsel of record for TransParent certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party:

**Plaintiffs:**

- The following parties are proceeding under pseudonyms, with an accompanying motion to proceed anonymously:

- EMMA KOE, individually and on behalf of her minor daughter, AMY KOE;
  - HAILEY MOE, individually and on behalf of her minor daughter, TORI MOE;
  - PAUL VOE;
  - ANNA ZOE, individually and on behalf of her minor daughter, LISA ZOE.
- TRANSPARENT, on behalf of its members. TransParent is a national not-for-profit organization incorporated in Missouri which has no parent corporation and no publicly-held company owns any interest in it. SUSAN HALLA is the Board Chair.

Defendants:

- CAYLEE NOGGLE, in her official capacity as Commissioner of the Georgia Department of Community Health;
- DANIEL DORSEY, in his official capacity as the Executive Director of the Georgia Composite Medical Board;
- GEORGIA DEPARTMENT OF COMMUNITY HEALTH'S BOARD OF COMMUNITY HEALTH, an agency created by state law;
- THE GEORGIA COMPOSITE MEDICAL BOARD, a board created by state law whose members are appointed by the Governor and confirmed by the Senate of the State of Georgia;
- The following individuals in their official capacities as members of the Georgia Department of Community Health's Board of Community Health:
  - NORMAN BOYD;
  - ROBERT S. COWLES III;
  - DAVID CREWS;

- RUSSELL CRUTCHFIELD;
  - ROGER FOLSOM;
  - NELVA LEE;
  - MARK SHANE MOBLEY;
  - CYNTHIA RUCKER;
  - ANTHONY WILLIAMSON.
- The following individuals in their official capacities as members of the Georgia Composite Medical Board:
    - JOHN S. ANTALIS;
    - SUBRAHMANYA BHAT;
    - WILLIAM BOSTOCK;
    - KATHRYN CHEEK;
    - RUTHIE CRIDER;
    - DEBI DALTON;
    - CHARMAINE FAUCHER;
    - AUSTIN FLINT;
    - SREENIVASULU GANGASANI;
    - JUDY GARDNER;
    - ALEXANDER S. GROSS;
    - CHARLES E. HARRIS, JR.;
    - J. JEFFREY MARSHALL;
    - MATTHEW W. NORMAN;

○ BARBY J. SIMMONS.

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

(3) There are no known persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case.

(4) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

For Plaintiff:

- SCOTT D. MCCOY, ELIZABETH “BETH” LITTRELL, and MAYA RAJARATNAM, with SOUTHERN POVERTY LAW CENTER;
- BENJAMIN G. BRADSHAW, DEANNA M. RICE, MEREDITH GARAGIOLA, DANIELLE SIEGEL, PATRIC REINBOLD, STEPHEN MCINTYRE, PAUL SIEBEN, JENNIFER BEARD and CARLY GIBBS with O’MELVENY & MYERS LLP;
- CORY ISAACSON and NNEKA EWULONU with AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF GEORGIA;
- CYNTHIA CHENG-WUN WEAVER and AMI RAKESH PATEL with HUMAN RIGHTS CAMPAIGN FOUNDATION.

For Defendant:

Defendants have not yet entered an appearance. Plaintiff will supplement this form upon identification of Defendants' counsel.

(5) Jurisdiction in this action is not based on diversity under 28 U.S.C. § 1332(a).

Respectfully submitted this 29th day of June, 2023.

SOUTHERN POVERTY LAW  
CENTER

/s/ Elizabeth Littrell

Elizabeth Littrell (GA Bar No. 454949)

Maya Rajaratnam (GA Bar No.  
452753)

150 Ponce de Leon Ave.

Ste. 340, Decatur GA 30030

Fax: (404) 221-5857

Email: Beth.Littrell@splcenter.org

Phone: (404) 221-5876

Maya.Rajaratnam@splcenter.org

Phone: (334) 398-0328

Scott D. McCoy (FL Bar No. 1004965)

2 Biscayne Boulevard, Suite 3750

Miami, FL 33131

Email: Scott.McCoy@splcenter.org

Phone: (334) 224-4309

O'MELVENY & MYERS

/s/ Benjamin G. Bradshaw

Benjamin G. Bradshaw (pro hac vice  
forthcoming)

Deanna M. Rice (pro hac vice  
forthcoming)

Meredith Garagiola (pro hac vice  
forthcoming)

Danielle Siegel (pro hac vice  
forthcoming)

Patric Reinbold (pro hac vice  
forthcoming)

Carly Gibbs (pro hac vice forthcoming)

O'MELVENY & MYERS LLP

1625 Eye Street N.W.

Washington, DC 20006

Tel: 202-383-5300

bbradshaw@omm.com

drice@omm.com

mgaragiola@omm.com

AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION OF  
GEORGIA

Cory Isaacson  
Georgia Bar No. 983797  
Nneka Ewulonu  
Georgia Bar No. 373718  
AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION OF  
GEORGIA

P.O. Box 570738  
Atlanta, GA 30357  
Telephone: (770) 415-5490  
CIsaacson@acluga.org  
NEwulonu@acluga.org

HUMAN RIGHTS CAMPAIGN  
FOUNDATION  
Cynthia Cheng-Wun Weaver\* NY No.  
5091848  
Ami Rakesh Patel\* CA No. 325647  
1640 Rhode Island Avenue NW  
Washington, D.C. 20036  
(202) 993-4180  
Cynthia.Weaver@hrc.org  
Ami.Patel@hrc.org

dsiegel@omm.com  
preinbold@omm.com  
cgibbs@omm.com

Stephen McIntyre (pro hac vice  
forthcoming)  
O'MELVENY & MYERS LLP  
400 South Hope Street, 18th Floor  
Los Angeles, CA 90071-2899  
Tel: 213-430-6000  
smcintyre@omm.com

Paul Sieben (pro hac vice forthcoming)  
O'MELVENY & MYERS LLP  
2765 Sand Hill Road  
Menlo Park, CA 94025-7019  
Tel: 650-473-2600  
psieben@omm.com

Jennifer Beard (pro hac vice  
forthcoming)  
O'MELVENY & MYERS LLP  
Two Embarcadero Center  
28th Floor  
San Francisco, CA 94111-3823  
Tel: 415-984-8700  
jbeard@omm.com

*Attorneys for Plaintiffs.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on June 29, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. There is currently no Counsel of Record for Defendants, and so I certify that I will serve the foregoing on Defendants along with the Complaint.

Elizabeth Littrell

/s/ Elizabeth Littrell